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AttorneysforDefendants
WELLSFARGOFINANCIAL
MISSOURI,INC,etal.

UNITEDSTATESDISTRICTCOURT
NORTHERNDISTRICTOFCALIFORNIA

RICHARDHOWARD,

Plaintiff,

vs.

WELLSFARGOFINANCIALMISSOURI,
INC.,WELLSFARGOFINANCIAL
ACCEPTANCE,WELLSFARGOAUTO
FINANCE,INC.,WELLSFARGO
FINANCIALCAR,LLC,andDOES1-50,

Defendants.

CaseNo.:CO7-05881EDL

**DECLARATIONOF RYAN BOWIE IN
SUPPORT OF WELLS FARGO'S
OPPOSITION TO PLAINTIFF'S
MOTION TO COMPEL FURTHER
RESPONSES TO DISCOVERY**

Dept.:E

Judge:Hon.ElizabethD.Laporte

ComplaintDate:November20,2007

I,RyanBowie,declareasfollows:

1. IamemployedbyWellsFargoBank,N.A.(“WellsFar go”)asanOperations
Manager.Exceptasotherwisespecificallystatedi nthisDeclaration,thefactssetforthhereinare
basedonpersonalknowledgeandbasedonmyreview ofthefilesrelatingtothisaccountandif
calledasawitnessIcouldandwouldbecompetent totestifytothosefacts.

2. Inresponsetoplaintiff’srequestsfordocuments, whichIhavereadandreviewed,
WellsFargohasperformedadiligentsearchbysear chingforalldocumentsresponsivetothe
requestswwhichwerenotobjectionable.WellsFargo searchedrelevantdivisionswithinits

1 company, which included Wells Fargo's credit dispute and fraud departments. The search
2 included a review of all relevant hard copy files as well as the electronically stored files.

3 3. To date, Wells Fargo has produced documents bates numbered WFFRH0001-
4 0423. The categories for which document production has been completed include the following:
5 policy and procedural manuals, record retention policies, organizational charts, profit and loss
6 statements, quarterly current balance sheets and financial statements, and all other documents
7 relating to plaintiff's credit file.

8 4. Wells Fargo has no responsive documents to request No. 59 in its possession,
9 custody and control.

10 5. If Wells Fargo were compelled to produce all responsive documents to request No.
11 68 it would cause undue hardship and expense on Wells Fargo. First, Wells Fargo would need to
12 locate every employee of Wells Fargo who took any action with regard to the investigation that
13 took place for plaintiff in 2007 and 2008. Wells Fargo is currently unaware of a simplified
14 process to identify such employees. Second, Wells Fargo would need to locate every
15 performance evaluation ever completed for each of those employees. This entire process could
16 potentially take weeks if not months to complete, costing Wells Fargo both time and expense.

17 I declare under penalty of perjury under the laws of the State of California that the
18 foregoing is true and correct and that this declaration was executed this 19th day of August, 2008,
19 at Chester, Pennsylvania.

22 By: /S/Ryan Bowie

23 Ryan Bowie

24 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
25 "conformed" signature (/S/) within this filed document.